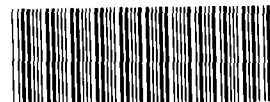




**Rocky Mountain
Remediation Services, L.L.C.**
... protecting the environment

Rocky Flats Environmental Technology Site
P.O. Box 464
Golden, Colorado 80402-0464
Phone: (303) 966-2678
Fax: (303) 966-8244



000063994

October 9, 1996

96-RF-05794
96-RM-ER-0184-KH

Phil D. Worley
Manager, Radiological Operations
Kaiser-Hill Company
Rocky Flats Environmental Technology Site
P.O. Box 464
Golden, Colorado 80402

RADIOLOGICAL DEFICIENCY REPORT 96-504 - AMT-069-96

As we discussed yesterday, October 8, 1996, on the telephone, I disagree with the statements on the description of the deficiency, and the event code for the above referenced radiological deficiency report (RDR). Your recommendation was to include an attachment to the RDR clarifying my concerns and provide the appropriate description and event codes. In addition, you requested that I cite the ORPS report number since this RDR will be tracked now through the ORPS system rather than by the RDR.

My understanding of the identified radiological deficiency at the Source Removal from the Trenches T-3/T-4 Project was the identification of radiological contamination greater than the posting for the area, not the language as stated in the current RDR.

Secondly, I recommend that the event code be changed to "2f". The event code is identified in the current RDR as "1g". I do not feel this is accurate. The location of the contamination was discovered in the exclusion area, which was a *controlled area* stipulated by the Health and Safety Plan. No one was allowed to enter the exclusion zone without the requisite training, qualifications, job briefing, and appropriate personal protective equipment. The event code, "2f", more accurately depicts the situation which states "improper or lacking radiological posting." The area of concern was originally posted as a radiological management area; and after the identification of the contaminated material, the area was upgraded to a contamination area and an RWP was obtained. This area was later upgraded to a high contamination area.

As you indicated on the RDR, the emergency operations center was activated. The incident is being tracked under the ORPS Report Number RFO--KHLL--ENVOPS-1996-0010. A fact-finding critique was conducted by RMRS and another by Kaiser-Hill on September 24, 1996. The corrective actions were identified in a separate meeting between the radiological management organization and the environmental restoration organization on September 25, 1996. The corrective actions are identified in the latest version of the occurrence report.

If you have any questions regarding these clarifications, please call me at (303) 966-4829.

Ann M. Tyson
Vice President
Environmental Restoration

AMT:cb

cc:

J. M. Wood - K-H
M/ C. Broussard - RMRS
R. J. Carr
J. L. McAnally
H. J. Zeile
B080 Document Control

10/10/96
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BZ-A-000475

1/2

RADIOLOGICAL DEFICIENCY REPORT

Rocky Flats Environmental Technology Site

Page 1 of 1

RDR #: 96-504

Commitment #

1. ORIGINATOR:

Name: <u>P. D. Worley</u>	Employee #	Signature: <u>P. D. Worley</u>	Ex/ Page: <u>6230/7978</u>
Job / Classification: <u>RAD OPS MANAGER</u>	Organization / Company: <u>KH</u>	Building: <u>73-8779</u>	Report Time / Date: <u>9/19/96 - PM</u>
Event Time / Date: <u>1200/ 9/19/96</u>	Building / Location: <u>73-74 TRENCH</u>	Event Code(s) (see reverse): <u>1.9</u>	
Description of radiological posting(s): <u>RADIOACTIVE MATERIAL AREA</u>			
Protective clothing worn: <u>LEVEL B SUIT W/ SCBA OR AIRLINE</u>			
Evolution(s) in progress: <u>SOIL REMEDIATION AND WASTE REMOVAL FROM T3-T4 TRENCH AREA</u>			
Individuals Involved: (When this section is completed, this form becomes SENSITIVE INFORMATION under the Privacy Act).			
Name:	Employee #:	Organization:	Job / Classification:
<u>UNKNOWN</u>			Supervisor:
Description of Deficiency: (Include documentation; RWP's, radiological survey results, etc.): <u>VERY HIGH LEVELS OF CONTAMINATION WERE FOUND AFTER DRUMS W/HIGH LEVELS OF CONTAMINATION ON THEM WERE CRUSHED WITH MINOR RADIOLOGICAL CONTROLS. THE HIGH LEVELS OF CONTAMINATION WERE DISCOVERED ON SOILS IN AN AREA APPROXIMATELY 50' X 50'.</u>			
Immediate Corrective Actions: <u>THE EMERGENCY OPERATIONS CENTER WAS ACTIVATED.</u>			

2. RO FOREMAN REVIEW:

Name: <u>James Johnston</u>	Employee	Signature: <u>James Johnston</u>	Date: <u>9-23-96</u>
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3. FACILITY MANAGER:

Name: <u>Sharon Gerner</u>	DOE CATEGORIZATION: <input checked="" type="checkbox"/> Unusual Occurrence <input type="checkbox"/> Emergency <input type="checkbox"/> Off - Normal <input type="checkbox"/> Internally Reportable <input type="checkbox"/> Not Applicable
Occurrence Report #	Signature: <u>Sharon Gerner</u> Date: <u>9-26-96</u>

4. RESPONSIBLE MANAGER: Reference letter 96-RF-05794; 96 RM-ER-0184-KH

Name: <u>Ann Tyson</u>	Employee #:	Signature: <u>Ann Tyson</u>	Date: <u>10/10/96</u>
Organization #:	Director Name: <u>Tyson</u>	Target completion date: <u>21 Sept 96</u>	Revised date: <u>22 Sept 96</u>
Completion Summary: <u>Recovery plan developed by KH was revised 9-21-96; cleanup executed on 9-22-96.</u>			
Apparent Cause Category: <input type="checkbox"/> Personnel <input type="checkbox"/> Procedure <input type="checkbox"/> Management System <input type="checkbox"/> Equipment <input type="checkbox"/> Training <input checked="" type="checkbox"/> Communications <input type="checkbox"/> Other			
I have corrected this RDR and recommend close out. Name: <u>Ann Tyson</u> Signature: <u>Ann Tyson SEE ATTACHED</u> Date: <u>10/10/96</u>			

5. RDR ADMINISTRATOR:

Actions have been reviewed, close out is: <input type="checkbox"/> Satisfactory, <input type="checkbox"/> Unsatisfactory, <input type="checkbox"/> Returned to the Responsible Manager (Date: <u>9/22/96</u>).	
Name:	Employee #
	Signature: <u>LETTER 96-RF-05794</u>
	Date:

5/2